

<i>SERFF Tracking Number:</i>	<i>AGNN-126575764</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Western National Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>45380</i>
<i>Company Tracking Number:</i>	<i>A161-02-RP</i>		
<i>TOI:</i>	<i>A02I Individual Annuities- Deferred Non-Variable</i>	<i>Sub-TOI:</i>	<i>A02I.002 Flexible Premium</i>
<i>Product Name:</i>	<i>Bank of America</i>		
<i>Project Name/Number:</i>	<i>Replacement Page/</i>		

Filing at a Glance

Company: Western National Life Insurance Company

Product Name: Bank of America

SERFF Tr Num: AGNN-126575764 State: Arkansas

TOI: A02I Individual Annuities- Deferred Non-Variable

SERFF Status: Closed-Approved- Closed State Tr Num: 45380

Sub-TOI: A02I.002 Flexible Premium

Co Tr Num: A161-02-RP

State Status: Approved-Closed

Filing Type: Form

Reviewer(s): Linda Bird

Author: Natalie Prevost

Disposition Date: 04/09/2010

Date Submitted: 04/07/2010

Disposition Status: Approved-Closed

Implementation Date Requested: On Approval

Implementation Date:

State Filing Description:

General Information

Project Name: Replacement Page

Status of Filing in Domicile: Pending

Project Number:

Date Approved in Domicile:

Requested Filing Mode: File & Use

Domicile Status Comments:

Explanation for Combination/Other:

Market Type: Individual

Submission Type: New Submission

Group Market Size:

Overall Rate Impact:

Group Market Type:

Filing Status Changed: 04/09/2010

Explanation for Other Group Market Type:

State Status Changed: 04/09/2010

Deemer Date:

Created By: Natalie Prevost

Submitted By: Natalie Prevost

Corresponding Filing Tracking Number:

Filing Description:

April 07, 2010

VIA SERFF

Re: Western National Life Insurance Company

NAIC: 70432

FEIN: 75-0770838

Forms: A161-02-RP Replacement Page

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Dear Mr. /Ms.:

The above referenced form is being submitted for your review and approval. This form is new and does not replace any form previously approved by your Department. The filing includes no assumption or provisions that unfairly discriminate in availability, rates, benefits, or any other way for prospective insureds of the same class, equal expectation of life, and degree of risk. This filing does not contain any unusual or controversial items. To the best of our knowledge, information and belief, the forms submitted herewith are in compliance with the provisions of the insurance laws, rules, regulations and bulletins of your state, and such form contains no provisions previously disapproved by your Department. The form is being filed simultaneously in our domicile state of Texas.

Form A161-02-RP is an individual, non-participating flexible premium deferred annuity replacement page which is intended to be used with A161-02 approved on 08/24/2002. The intention of this replacement page is to amend the Income Plans provision in order to reduce the maximum annuitization age from 100 to 95.

Since the original approval of policy A161-02 we have made changes to the text of the policy in order to incorporate endorsement form R378-04 approved by your department on 11/01/2005. This endorsement was originally approved by your state assuming that upon policy form reprint, the terms of the entire endorsement would be incorporated into each policy, and the endorsement discontinued. Due to these changes the maximum annuitization age located in the Income Plans provision remains located on page 7 although the location of the provision on the page has changed. The enclosed replacement page will replace page 7 of the policy that is currently being issued.

No other changes outside of the maximum annuitization age are being filed for your approval with this replacement page. Upon approval the replacement page and the new provision will become a part of all new policies issued.

If you have any questions or need additional information, please contact me at (713) 831-8705 or via e-mail at Natalie.prevost@valic.com. I look forward to your formal notification of approval.

Sincerely,

Natalie Prevost
Legal Analyst

Enclosures

SERFF Tracking Number: AGNN-126575764 State: Arkansas
Filing Company: Western National Life Insurance Company State Tracking Number: 45380
Company Tracking Number: A161-02-RP
TOI: A021 Individual Annuities- Deferred Non- Sub-TOI: A021.002 Flexible Premium
Variable
Product Name: Bank of America
Project Name/Number: Replacement Page/

Company and Contact

Filing Contact Information

Natalie Prevost, natalie.prevost@aigretirement.com
2919 Allen Parkway 713-831-8705 [Phone]
L10-30 713-831-6932 [FAX]
Houston, TX 77019

Filing Company Information

Western National Life Insurance Company CoCode: 70432 State of Domicile: Texas
2929 Allen Parkway, L10-30 Group Code: 12 Company Type:
Houston, TX 77019 Group Name: State ID Number:
(713) 831-6006 ext. [Phone] FEIN Number: 75-0770838

Filing Fees

Fee Required? Yes
Fee Amount: \$100.00
Retaliatory? Yes
Fee Explanation: Fee for filing in Texas
Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Western National Life Insurance Company	\$100.00	04/07/2010	35469499

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<i>Company Tracking Number:</i>	<i>A161-02-RP</i>		
<i>TOI:</i>	<i>A02I Individual Annuities- Deferred Non-Variable</i>	<i>Sub-TOI:</i>	<i>A02I.002 Flexible Premium</i>
<i>Product Name:</i>	<i>Bank of America</i>		
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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Linda Bird	04/09/2010	04/09/2010

<i>SERFF Tracking Number:</i>	<i>AGNN-126575764</i>	<i>State:</i>	<i>Arkansas</i>
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Disposition

Disposition Date: 04/09/2010

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

<i>SERFF Tracking Number:</i>	<i>AGNN-126575764</i>	<i>State:</i>	<i>Arkansas</i>
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Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		No
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Form	Replacement Page		Yes

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TOI: A02I Individual Annuities- Deferred Non- Sub-TOI: A02I.002 Flexible Premium
Variable

Product Name: Bank of America

Project Name/Number: Replacement Page/

Form Schedule

Lead Form Number: A161-02-RP

Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	A161-02-RP	Certificate Amendment, Insert Page, Endorsement or Rider	Replacement Page	Initial			A161-02-RP.pdf

(Owner/Annuitant). The Owner may select either the Owner or the Annuitant to be the Owner/Annuitant, beginning on the Annuity Date, subject to the limitations described in this section and in the *Annuitant* provision of this policy.

If the Owner is a natural person, and if the Owner does not elect otherwise, the Owner will be the Owner/Annuitant on the Annuity Date. If the Owner is not a natural person, and if the Owner does not elect otherwise, the Annuitant will be the Owner/Annuitant on the Annuity Date. An Annuitant who is also a representative of an Owner that is not a natural person, such as an Annuitant who is the trustee of the trust under which the policy is held, may receive income plan payments in a representative capacity.

Any change of Owner or Annuitant can have income tax consequences, and may cause the distribution requirements in this policy to apply. We will pay the income to the Owner or a designated payee.

The amount of income paid under an income plan will depend on the amount applied to purchase the plan and the income plan option selected. The rate of interest guaranteed under these income plan options is 1.5% per year. The minimum income plan values are based on the A2000 Individual Annuity Valuation Tables, sex distinct, with interest at 1.5%. The attained age at annuitization will be adjusted downward by one year for each full five year period that has elapsed since January 1, 2000. The tables on page 11 show the guaranteed minimum income plan values for monthly payments. These amounts could be greater, depending on the actual interest rates and the payment frequency selected.

For each plan, the amount shown under the Annuitant's sex and age as of the Annuity Date is the minimum amount that we will pay monthly for each \$1,000 applied to purchase the plan. Upon request, we will provide information on payment amounts for other ages

or for unisex mortality factors. (See *Employer-Sponsored Plans* on page 9 for more information.)

You choose the Annuity Date. The Annuity Date may be any time after three years from the Policy Date. (You may choose an earlier Annuity Date, but the early withdrawal charge will be deducted before the income payment amount is calculated.)

If you do not elect an earlier date, income payments will start when the Owner reaches age 95. The income plan options are described below. If you do not choose another income plan, we will pay according to Plan B, with payments guaranteed for ten years.

Your income plan options are:

Plan A - Life Income: Provides income payments for the Annuitant's entire lifetime. Income payments will end upon the Annuitant's death.

Plan B - Life Income with 5, 10, 15 or 20 Years Guaranteed: Provides income payments for as long as the Annuitant lives. If the Annuitant dies before the guarantee period is over, we will continue to make payments until the end of the guarantee period. You choose the guarantee period of 5, 10, 15 or 20 years.

Plan C - Life Income with Installment Refund: Provides income payments for as long as the Annuitant lives. If the Annuitant dies before the guarantee period is over, we will continue to make payments until the total amount applied to the plan has been refunded. The length of the guarantee period is calculated by dividing the amount applied to the income plan by the monthly income payment amount.

Plan D - Fixed Amount: Provides fixed amount income payments for a minimum of five years and a maximum of 20 years in an amount elected until the amount applied is exhausted.

Plan E - Fixed Period Income: Provides equal periodic income payments for a predetermined

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Supporting Document Schedules

	Item Status:	Status Date:
Bypassed - Item:	Flesch Certification	
Bypass Reason:	n/a-replacement page only filing; readability certification included with original full contract filing	
Comments:		

	Item Status:	Status Date:
Bypassed - Item:	Application	
Bypass Reason:	n/a- replacement page only filing	
Comments:		

	Item Status:	Status Date:
Bypassed - Item:	Life & Annuity - Acturial Memo	
Bypass Reason:	n/a	
Comments:		